

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

ATLANTA DIVISION

UNITED STATES OF AMERICA	:	
	:	CRIMINAL CASE
v.	:	
	:	No. 1:21-CR-64 (JPB)(AJB)
YUN JAE MOON	:	
_____	:	

UNOPPOSED MOTION FOR EXTENSION OF TIME
TO FILE PRETRIAL MOTIONS
AND TO CONTINUE PRETRIAL CONFERENCE

Comes now, YUN JAE MOON, Defendant in the above-styled action, by and through undersigned counsel, and moves this Court to grant an extension of time to file pretrial motions and to continue the pretrial conference currently scheduled for March 9, 2021. In support of this motion, Mr. Moon shows as follows:

(1)

Mr. Moon is the lone defendant named in a single count indictment charging him with conspiracy against the United States in violation of 18 U.S.C. § 371.

(2)

On February 19, 2021, Mr. Moon was arraigned on the indictment.

(3)

On February 24, 2021, this Court entered a pretrial scheduling order calling for motions to be filed by March 8, 2021, and a pretrial conference on March 9, 2021.

(4)

The discovery in this case is voluminous.

(5)

The government has provided some of the discovery and has made the remainder available to undersigned counsel.

(6)

Counsel cannot determine what motions must be submitted until he has reviewed all of the discovery.

(7)

Counsel believes he can have the discovery reviewed and motions filed in thirty days.

(8)

Mr. Moon requests this Court extend the time for filing pretrial motions until April 8, 2021, and thereafter schedule a pretrial conference.

(9)

Counsel for the government, Thomas Krepp, has been contacted and does not oppose this Motion.

WHEREFORE, this Court should grant an extension of time to file pretrial motions and continue the pretrial conference currently scheduled for March 9, 2021.

Dated, this the 6th day of March, 2021.

Respectfully submitted,

/s/Jeffrey L. Ertel

JEFFREY L. ERTEL

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COUNSEL FOR MR. MOON

CERTIFICATE OF SERVICE

I hereby certify that the foregoing has, pursuant to Local Rule 5.1, has been formatted in Times New Roman, 14 Point, electronically filed and served upon counsel:

Thomas Krepp, Esq.
Assistant United States Attorney
600 Richard B. Russell Building
75 Ted Turner Drive, S. W.
Atlanta, Georgia 30303

Dated, this the 6th day of March, 2021.

s/Jeffrey L. Ertel